

Message

From: Brachtl, Megan [Brachtl.Megan@epa.gov]
Sent: 3/12/2018 12:34:22 PM
To: Robinson, Jeffrey [Robinson.Jeffrey@epa.gov]
Subject: FW: seeking info for management on the SSM-related meeting with TX
Attachments: Issue paper 2018 - Texas.docx; One Pager - Texas SSM and Chapter 111 SIP Revision.docx

Megan V. Brachtl, Group Leader
State and Local Programs Group
Office of Air Quality Planning and Standards
U.S. Environmental Protection Agency

Conference Line/Code / Ex. 6

From: Donaldson, Guy
Sent: Wednesday, March 07, 2018 11:42 AM
To: Brachtl, Megan <Brachtl.Megan@epa.gov>; Feldman, Michael <Feldman.Michael@epa.gov>
Cc: Sutton, Lisa <Sutton.Lisa@epa.gov>; Shar, Alan <shar.alan@epa.gov>
Subject: RE: seeking info for management on the SSM-related meeting with TX

Megan,

There are two issues on SSM in Texas. As I said, I am not sure if one or both will be discussed.

- 1) Texas has in its chapter 101 rules an affirmative defense that applies generally to any violations during unplanned activities or upsets. This was a subject of the SIP call which they have sued us on.
- 2) Texas has a particular issue in its rules for opacity and PM contained in its chapter 111 rules. Texas interprets these rules to have an unwritten exemption during start up and shutdown for coal fired power plants with ESPs. This has been an issue raised in a number of Title V petitions.

Deliberative Process / Ex. 5

From: Brachtl, Megan
Sent: Wednesday, March 07, 2018 7:44 AM
To: Feldman, Michael <Feldman.Michael@epa.gov>; Donaldson, Guy <Donaldson.Guy@epa.gov>
Cc: Sutton, Lisa <Sutton.Lisa@epa.gov>
Subject: seeking info for management on the SSM-related meeting with TX

Hi Michael and Guy – Hope you're well. Do you have any backgrounder or briefing paper you could share about Monday's meeting scheduled with TX on SSM? Anna's asked us to prepare something for her, but we know nothing about it. Please share what you can, and hopefully we can discuss further at our check-in this afternoon.

Also, definitely need to discuss on our call the timing of HQ review on the St. Bernard SIP. Monday will be difficult to meet I expect, esp. if the TSD won't be available until Friday (?). Talk to you soon.

Thanks,
Megan

Megan V. Brachtel, Group Leader
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